EXHIBIT A

All filings from the Eighth Judicial District Court Case No. A-23-874098-C

Total Remitted: \$270.00 DATED: July 17, 2023 KING SCOW KOCH DURHAM LLC /s/ Steven B. Scow STEVEN B. SCOW Attorneys for Plaintiff k Financial Services

was hired by the Sentosa Homeowners Association (the "Association") as its agent to manage and collect assessments charged to homeowners within the Association.

- 2. On information and belief, Michael Russo is the administrator of the estate of John Battista Russo and resides in Woodbine, Maryland. In the event Michael Russo is not the current administrator or property party, Plaintiff will seek leave to amend this Complaint to allege the true name and capacity of the person handling the estate of John Battista Russo when such information is ascertained.
- 3. On information and belief, Defendant Eva Aida Russo is an individual who resides in Clark County, Nevada
- 4. On information and belief, The Secretary of Housing and Urban

 Development is a government agency formed under the laws of the United States, which, at all times material herein, was doing business in Clark County, Nevada.
- 5. On information and belief, Nationstar Mortgage dba Mr. Cooper is a national mortgage association which, at all times material herein, was doing business in Clark County, Nevada.
- 6. On information and belief, Wells Fargo Bank is a national banking association which, at all times material herein, was doing business in Clark County, Nevada.
- 7. Defendant Republic Services, Inc. is a Nevada corporation, which, at all times material herein, was doing business in Clark County, Nevada.
- 8. Plaintiff is unaware currently of the true names and capacities of those defendants sued herein as DOES 1-100 and therefore sues said defendants by such fictitious names. Plaintiff will seek leave of the court to amend this Complaint to allege the true names and capacities of said defendants when the same have been ascertained.
- 9. Plaintiff is informed and believes, and thereon alleges, that each of the defendants sued herein, including those named as DOES, are the agents, servants, employees, predecessor entities, successor entitles, parent entities, totally owned or controlled entities, or had some legal relationship of responsibility for, the other

defendants, and in doing the things herein alleged, acted within the course and scope and authority of such agency, employment, ownership or other relationship and with the full knowledge and consent of the other defendants, or are in some other manner legally responsible for the acts as alleged herein. Additionally, with respect to all corporate entity defendants, the officers and directors of such entities ratified and affirmed all contracts of its employees, agents, directors and/or officers.

GENERAL ALLEGATIONS

- 10. RRFS is a debt collection company, which works on behalf of homeowner associations to collect debts secured by real property, including delinquent homeowner assessments. When a property owner becomes delinquent to the homeowners association, RRFS is contracted to help collect the debt. These efforts include attempts to collect the debt directly from the property owner, but when the property owner does not pay, this process culminates in a non-judicial foreclosure action pursuant to Nevada law.
- 11. Here, RRFS was contracted by the Association to collect debts for unpaid homeowners assessments owed to the Association by John Battista Russo and Eva Aida Russo for the property located at 1876 Stablegate Ave., Las Vegas, NV 89123, APN: 178-20-617-011 ("the Subject Property"). RRFS's efforts resulted in a foreclosure sale of the Subject Property on or about April 20, 2022.
- 12. In connection with the foreclosure sale, the Association was paid the money it was owed, and RRFS was paid its fees and costs incurred in collecting the debt as allowed by contract and Nevada law. After paying these costs, RRFS was left with funds of \$208,056.22. RRFS has no further direct interest in such funds. These funds have been deposited into counsel's attorney-client trust account and \$3,500.00 has been withheld as costs, expenses, and fees to commence this action. The remainder of such funds (the "Excess Proceeds") will be deposited with the Court as directed by this Court.

FIRST CAUSE OF ACTION

(Interpleader (NRCP 22) – Against All Defendants)

- 13. RRFS repeats and realleges all previous allegations as if fully set forth herein.
- 14. Records in Clark County, Nevada indicate that there are several potential liens and claims to the Excess Proceeds secured by the Property. RRFS believes these claims may exceed the amount currently in the possession of RRFS. Plaintiff does not know the current status of such claims, nor does it have knowledge how the funds should be distributed to the various defendants. Plaintiff is therefore faced with potential for multiple liability.
- 15. Plaintiff will serve the defendants with this Complaint; it requests that the Court determine how such funds should be distributed.
- 16. RRFS has incurred attorneys' fees and costs in preparing, filing and prosecuting this action and seeks reimbursement for those attorneys' fees and costs from the amount deposited with the Court per Nevada law, including NRS 116.31164.
- 17. RRFS requests that, after the parties have been served or at such other appropriate time, that it be dismissed from this action, as it has no direct interest in the interpleaded funds other than payment of its costs and fees for bringing the instant action.

PRAYER

WHEREFORE, RRFS prays for relief as follows:

- 1. That the Court determine how the Excess Proceeds should be distributed and order distribution of said funds;
- 2. That RRFS be reimbursed out of the Excess proceeds its attorneys' fees and costs in bringing this interpleader action;

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 $_{27}\| ///$

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Filed 08/24/23

AOS

VS

DISTRICT COURT **CLARK COUNTY, NEVADA**

Page 9 of 21 **Electronically Filed** 7/24/2023 8:54 AM Steven D. Grierson CLERK OF THE COURT

RED ROCK FINANCIAL SERVICES

Plaintiff

CASE NO: A-23-874098-C

HEARING DATE/TIME:

MICHAEL RUSSO, ADMINISTRATOR OF THE **ESTATE OF JOHN BATTISTA RUSSO; EVA AIDA**

RUSSO, AN INDIVIDUAL; THE SECRETARY OF HOUSING AND URBAN DEVELOPMENT;

Defendant

DEPT NO: 5

NATIONSTAR MORTGAGE DBA MR. COOPER;

WELLS FARGO BANK; REPUBLIC SERVICES, AFFIDAVIT OF SERVICE

WELLS FARGO BANK; REPUBLIC SERVICES, AFFIDAVIT OF SERVICE

AFFIDAVIT OF SERVICES

ARANZA AGUILAR being duly sworn says: That at all times herein affiant was and is a citizen of the United States, over 18 years of age, not a party to or interested in the proceedings in which this affidavit is made. That affiant received 1 copy(ies) of the SUMMONS, COMPLAINT, INITIAL APPEARANCE FEE DISCLOSURE, on the 18th day of July, 2023 and served the same on the 20th day of July, 2023, at 14:10 by:

serving the servee NATIONSTAR MORTGAGE DBA MR. COOPER C/O REGISTERED AGENT CORPORATION SERVICE COMPANY by personally delivering and leaving a copy at (address) 112 NORTH CURRY STREET, CARSON CITY NV 89703 with KRIS OSBORN, CLERK pursuant to NRS 14,020 as a person of suitable age and discretion at the above address, which address is the address of the resident agent as shown on the current certificate of designation filed with the Secretary of State.

Pursuant to NRS 53.045

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

2023 EXECUTED this 20 day of Jul

ARANZA AGUILAR R-095409

Junes Legal Service, Inc. - 630 South 10th Street - Suite B - Las Vegas NV 89101 - 702.579.6300 - fax 702.259.6249 - Process License #1068

EP277123 RRFS/RUSSO

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Case Number: A-23-874098-C

Filed 08/24/23

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AOS

DISTRICT COURT **CLARK COUNTY, NEVADA**

Electronically Filed 7/24/2023 8:54 AM Steven D. Grierson CLERK OF THE COUR

RED ROCK FINANCIAL SERVICES

Plaintiff

CASE NO: A-23-874098-C

HEARING DATE/TIME:

VS

MICHAEL RUSSO, ADMINISTRATOR OF THE **ESTATE OF JOHN BATTISTA RUSSO; EVA AIDA** RUSSO, AN INDIVIDUAL; THE SECRETARY OF HOUSING AND URBAN DEVELOPMENT; NATIONSTAR MORTGAGE DBA MR. COOPER;

Defendant

DEPT NO: 5

WELLS FARGO BANK; REPUBLIC SERVICES, AFFIDAVIT OF SERVICE

ARANZA AGUILAR being duly sworn says: That at all times herein affiant was and is a citizen of the United States, over 18 years of age, not a party to or interested in the proceedings in which this affidavit is made. That affiant received 1 copy(ies) of the SUMMONS, COMPLAINT, INITIAL APPEARANCE FEE DISCLOSURE, on the 18th day of July, 2023 and served the same on the 20th day of July, 2023, at 14:15 by:

serving the servee REPUBLIC SERVICES C/O REGISTERED AGENT CT CORPORATION SYSTEM by personally delivering and leaving a copy at (address) 701 S. CARSON ST., STE. 200, CARSON CITY NV 89701 with ANA GOMES, CLERK pursuant to NRS 14,020 as a person of suitable age and discretion at the above address, which address is the address of the resident agent as shown on the current certificate of designation filed with the Secretary of State.

Pursuant to NRS 53.045

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

2023 EXECUTED this 20 day of Jul

> ARANZA AGUILAR R-095409

Junes Legal Service, Inc. - 630 South 10th Street - Suite B - Las Vegas NV 89101 - 702.579.6300 - fax 702.259.6249 - Process License #1068

EP277136 RRFS/RUSSO

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Case Number: A-23-874098-C

Filed 08/24/23

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AOS

VS

DISTRICT COURT **CLARK COUNTY, NEVADA**

Electronically Filed 7/24/2023 8:54 AM Steven D. Grierson CLERK OF THE COUR

RED ROCK FINANCIAL SERVICES

Plaintiff

CASE NO: A-23-874098-C

HEARING DATE/TIME:

MICHAEL RUSSO, ADMINISTRATOR OF THE ESTATE OF JOHN BATTISTA RUSSO; EVA AIDA

Defendant

DEPT NO: 5

RUSSO, AN INDIVIDUAL; THE SECRETARY OF HOUSING AND URBAN DEVELOPMENT; NATIONSTAR MORTGAGE DBA MR. COOPER;

WELLS FARGO BANK; REPUBLIC SERVICES, AFFIDAVIT OF SERVICE

ARANZA AGUILAR being duly sworn says: That at all times herein affiant was and is a citizen of the United States, over 18 years of age, not a party to or interested in the proceedings in which this affidavit is made. That affiant received 1 copy(ies) of the SUMMONS, COMPLAINT, INITIAL APPEARANCE FEE DISCLOSURE, on the 18th day of July, 2023 and served the same on the 20th day of July, 2023, at 14:10 by:

serving the servee WELLS FARGO BANK C/O REGISTERED AGENT COPORATION SERVICE COMPANY by personally delivering and leaving a copy at (address) 112 NORTH CURRY ST., CARSON CITY NEVADA 89703 with KRIS OSBORN, CLERK pursuant to NRS 14,020 as a person of suitable age and discretion at the above address, which address is the address of the resident agent as shown on the current certificate of designation filed with the Secretary of State.

Pursuant to NRS 53.045

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

2023 EXECUTED this 20 day of Jul

ARANZA AGUILAR R-095409

Junes Legal Service, Inc. - 630 South 10th Street - Suite B - Las Vegas NV 89101 - 702.579.6300 - fax 702.259.6249 - Process License #1068

EP277121 RRFS/RUSSO

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Case Number: A-23-874098-C

Filed 08/24/23

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AOS

DISTRICT COURT CLARK COUNTY, NEVADA

RED ROCK FINANCIAL SERVICES

Plaintiff

CASE NO: A-23-874098-C

HEARING DATE/TIME:

VS

Defendant

DEPT NO: 5

MICHAEL RUSSO, ADMINISTRATOR OF THE ESTATE OF JOHN BATTISTA RUSSO; EVA AIDA RUSSO, AN INDIVIDUAL; THE SECRETARY OF HOUSING AND URBAN DEVELOPMENT; NATIONSTAR MORTGAGE DBA MR. COOPER

WELLS FARGO BANK; REPUBLIC SERVICES, AFFIDAVIT OF SERVICE NEVADA CORPORATION; AND DOES 1-100

Mark Hagood being duly sworn says: That at all times herein affiant was and is a citizen of the United States, over 18 years of age, not a party to or interested in the proceedings in which this affidavit is made. That affiant received 1 copy(les) of the SUMMONS, COMPLAINT, INITIAL APPEARANCE FEE DISCLOSURE, on the 18th day of July, 2023 and served the same on the 25th day of July, 2023, at 09:23 by:

serving the servee THE SECRETARY OF HOUSING AND URBAN DEVELOPMENT C/O THE ASSOCIATE GENERAL COUNSEL FOR LITIGATION OFFICE OF LITIGATION by personally delivering and leaving a copy at (address) U.S. DEPARTMENT OF HOUSING ANDURBAN, 1250 MARYLAND AVE, SW SUITE 200, WASHINGTON DC 20024 with Pinkle Robinson as AUTHORIZED TO ACCEPT, an agent lawfully designated by statute to accept service of process;

Pursuant to NRS 53.045

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

EXECUTED this 3 day of AUT.

Junes Legal Service, Inc. - 630 South 10th Street - Suite B - Las Vegas NV 89101 - 702.579.6300 - fax 702.259.6249 - Process License #1068

EP277124 RRFS/RUSSO

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Case 2:23-cv-01313-RFB-DJA

WILLIAMS * STARBUCK

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- I. Answering paragraphs 1, 2, 3, 4, 5, 6, 8, 9, 10, 11, 12, 13, 14, 15, 16 and 17 of the allegations in the Complaint, Defendant states that it is without knowledge or information necessary to determine the truth or falsity of the allegations contained therein and therefore denies the same.
- II. Answering paragraph 7 of the allegations in the Complaint, Defendant admits the allegations contained therein.

AFFIRMATIVE DEFENSES

- Regardless of any dispute between Plaintiff and the other Defendants, Republic's liens enjoy priority over the liens of Plaintiff and of the other Defendants and are not extinguished by foreclosure pursuant to NRS 444.520(3) and any other relevant statutes and/or city or county ordinances.
- 2. Pursuant to NRCP 11, as amended, all possible affirmative defenses may not have been alleged herein insofar as sufficient facts were not available after reasonable inquiry upon the filing of Defendant's Answer, and therefore, Defendant reserves the right to amend this Answer to allege additional affirmative defenses, if subsequent investigation warrants.

DATED this 10th day of August, 2023.

WILLIAMS ❖ STARBUCK
/s/ Drew Starbuck, Esq./s/
DONALD H. WILLIAMS, ESQ.
Nevada Bar No. 5548
DREW J. STARBUCK, ESQ.
Nevada Bar No. 13964
AARON R. TIPPETTS III, ESQ.
Nevada Bar No. 16459
612 South Tenth Street
Las Vegas, Nevada, 89101
Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that on 10th day of August, 2023, a copy of the foregoing <u>ANSWER TO</u>

<u>COMPLAINT</u> was delivered to the following via online efile and served pursuant to

Administrative Order <u>14-2</u>;

/s/ Robin D. Gullo/s/ WILLIAMS ❖ STARBUCK

Case 2:23-cv-01313-RFB-DJA Document 1-2 Filed 08/24/23 Page 16 of 21 **Electronically Filed** 8/14/2023 9:19 AM Steven D. Grierson CLERK OF THE COUR DAVID R. KOCH (NV Bar No. 8830) STEVEN B. SCOW (NV Bar No. 9906) DANIEL G. SCOW (NV Bar No. 14614) **KOCH & SCOW LLC** 3 11500 S. Eastern Ave., Suite 210 Henderson, NV 89052 4 dkoch@kochscow.com sscow@kochscow.com 5 dscow@kochscow.com Telephone: (702) 318-5040 6 Facsimile: (702) 318-5039 7 Attorneys for Plaintiff Red Rock Financial Services 8 DISTRICT COURT 9 CLARK COUNTY, NEVADA 10 RED ROCK FINANCIAL SERVICES, Case No. A-23-874098-C 11 Dept. 5 Plaintiff, 12 vs. **DEFAULT AGAINST** 13 NATIONSTAR MORTGAGE MICHAEL RUSSO, ADMINISTRATOR OF **DBA MR. COOPER** 14 THE ESTATE OF JOHN BATTISTA RUSSO; 15 EVA AIDA RUSSO, an individual; THE SECRETARY OF HOUSING AND URBAN 16 DEVELOPMENT; NATIONSTAR MORTGAGE DBA MR. COOPER; WELLS 17 FARGO BANK; REPUBLIC SERVICES, a 18 Nevada corporation; and DOES 1-100; 19 Defendants. 20 21 It appearing from the files and records in the above-entitled action that 22 NATIONSTAR MORTGAGE DBA MR. COOPER, a defendant herein, being duly served 23 with a copy of the summons, complaint, and initial appearance fee disclosure in this 24 action, in accordance with the Affidavit of Service filed on July 24, 2023, and more than 25 21 days, exclusive of the day of service (which was July 20, 2023), having expired since 26 service being effected upon defendant; that no answer or other appearance having been 27 28

1	filed and no further time having been granted, the default of the above-named defendar for failing to answer or otherwise plead to Plaintiff's Complaint is hereby entered.	
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3		CLARK COUNTY CLERK OF COURT
4		STEVEN D. GRIERSON
5		All sun Allands
6		By:
7		DEPUTY CLERK A-23-874098-C Michelle McCarthy
8		Date: 8/15/2023
9		
10		
11	Submitted by:	
12	/s/ Steven B. Scow Steven B. Scow (Bar No. 9906)	
13	KOCH & SCOW, LLC	
14	11500 S. Eastern Ave., Ste. 210 Henderson, NV 89052	
15	Tel: 702-318-5040 Fax: 702-318-5039	
16	Attorneys for Plaintiff	
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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Koch & Scow and on August 14, 2023, I electronically filed and served the foregoing **DEFAULT AGAINST NATIONSTAR MORTGAGE DBA MR. COOPER** with the Eighth Judicial District Court, County of Clark, State of Nevada EFile system.

Executed on August 14, 2023 at Henderson, Nevada.

/s/ Andrea W. Eshenbaugh
An Employee of Koch & Scow LLC

1 2

1	having been granted, the default of the above-named defendant for failing to answer or otherwise plead to Plaintiff's Complaint is hereby entered.	
2		
3	CLARK COUNTY CLERK OF COURT	
4	STEVEN D. GRIERSON	
5		
6	By: Westle of Vary	
7	DEPUTY CLERK A 23-874098-C	
8	Michelle McCarthy Date:8/15/2023	
9		
10		
11	Submitted by:	
12	/s/ Steven B. Scow	
13	Steven B. Scow (Bar No. 9906) KOCH & SCOW, LLC	
14	11500 S. Eastern Ave., Ste. 210	
15	Henderson, NV 89052 Tel: 702-318-5040	
16	Fax: 702-318-5039 Attorneys for Plaintiff	
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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Koch & Scow and on August 14, 2023, I electronically filed and served the foregoing **DEFAULT AGAINST WELLS FARGO BANK** with the Eighth Judicial District Court, County of Clark, State of Nevada EFile system.

Executed on August 14, 2023 at Henderson, Nevada.

/s/ Andrea W. Eshenbaugh
An Employee of Koch & Scow LLC